



Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

JAN 10 1994

94-DOE-00623

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DUE
DATE

ACTION	
DIST.	LTR ENC
BENEDETTI, R.L.	
BENJAMIN, A.	
BERMAN, H.S.	
CARNIVAL, G.J.	
COPP, R.D.	
CORDOVA, R.C.	
DAVIS, J.G.	
FERRERA, D.W.	
FRANZ, W.A.	
HANNI, B.J.	
HEALY, T.J.	
HEDAH, T.G.	
HILBIG, J.G.	
HUTCHINS, N.M.	
KIRBY, W.A.	
KUESTER, A.W.	
MAHAFFEY, J.W.	
MANN, H.P.	
MARX, G.E.	
McKENNA, F.G.	
MORGAN, R.V.	
PIZZUTO, V.M.	
POTTER, G.L.	
SANDLIN, N.B.	
SATTERWHITE, D.G.	
SCHUBERT, A.L.	
SETLOCK, G.H.	
SULLIVAN, M.T.	
SWANSON, E.R.	
WILKINSON, R.B.	
WILSON, J.M.	

Mr. Gary Baughman
Hazardous Waste Facilities Unit Leader
Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530



000021214

Dear Mr. Baughman:

The Department of Energy (DOE) has reviewed the conditions the Colorado Department of Health (CDH) has attached to the approval of our request for a change to interim status to allow Solar Evaporation Pond sludge to be stored in tanks on the 750 Pad. We understand that this conditional approval applies to sludge from the 207-A and 207-B ponds only (the sludge is currently consolidated in Pond 207-B South).

DOE accepts the conditions proposed by the Division. For clarity we would like to briefly describe how we intend to meet those conditions.

- 1) Written Standard Operating Procedure (SOP): We plan to use the plant's existing written procedure for inspections. The procedure is applicable to the 750 Pad tanks and provides detailed instruction on how to perform the inspection. The procedure is attached for your information.
- 2) Tank Sampling: Additional sampling will be arranged. We have been satisfied with the existing characterization data that has been submitted to your staff, so we need to understand your assessment of the data and what further information is required. We would like to meet with your staff prior to submitting the written sampling plan to review the existing data and ensure further sampling and analysis will meet the Division's needs. We understand that the sample plan preparation and implementation can follow sludge transfer.
- 3) Tank Integrity: Tank integrity will be assessed over time. We intend to install coupons in six tanks with analysis after 5 and 10 years of operation. Eight coupons will be put in each of the six tanks, two for 207-B, two for 207-C, and two for clarifier. Coupon tests will focus on impact for brittleness and tensile strength for hoop stress. We understand that these activities can follow the start of sludge transfer into the first tanks, so long as the coupons are in place when the tanks with coupons are filled.
- 4) Tank Certification: We have already begun work on the certifications for the tanks, and will submit those certifications as they are completed. The certifications have been scheduled for groups of tanks, so the Division will receive multiple submittals until the entire tank farm is completed. A construction-status drawing will be included with each certification package to cover the tanks being certified in that package. (DOE marks drawings "as-builts" only after all construction on a project is complete. We will be submitting certifications for sub-sets of the total construction. The construction-status drawings should meet the Division's need.) The tank certification plan is enclosed for your information.

ROCKY FLATS PLANT
CORRESPONDENCE CENTER

JAN 12 9 11 AM '94

Stiger SX

Keith SX

CORRES CONTROL x x
PATS/T130G

Reviewed for Addressee
Corres. Control RFP

1-12-94
DATE BY

Ref Ltr. #

DOE ORDER # 5400-1

ADMIN RECCRD

IA-A-000337

JAN 10 1994

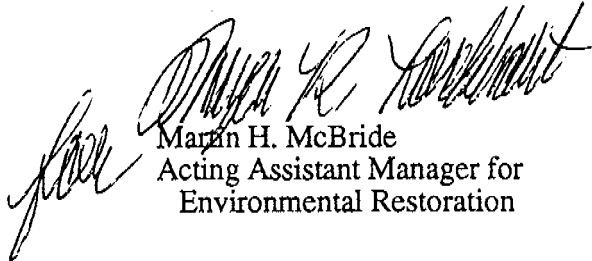
To facilitate the sludge transfer, we have authorized EG&G to submit the certifications directly to your office. We understand that the certification must be submitted to the Division prior to transferring sludge, but we note the Division has not requested DOE wait for your response. We will, therefore, expect to proceed with the transfer as operationally convenient after the certification is submitted.

- 5) 207C Pond Sludge: The remaining issues to be resolved for Pond 207-C and the clarifier (Unit 48) seem related to condition 2 above. We would like to work with you to resolve these issues by February 7, 1994.

The other key portion of our revised Part A, which is under review by your staff, is a request to allow storage of other Solar Ponds mixed wastes, in particular investigation derived materials, on the 750 Pad. Our staffs are working together directly on this request, and we are anxious to receive the Division's approval as early in January as possible.

DOE is enthusiastic about being the sludge transfer operation. When completed for Ponds 207-B and C, the sludge transfer will meet the first of the revised milestones that were established in the Operable Unit 4 dispute resolution. DOE plans to accomplish this milestone ahead of schedule as a demonstration of our commitment to environmental clean-up at Rocky Flats. For further discussion, please contact Frazer Lockhart at 966-4538.

Sincerely,


Martin H. McBride
Acting Assistant Manager for
Environmental Restoration

Enclosures

cc w/Enclosures:
M. Hestmark, EPA
A. Duran, EPA

cc w/o Enclosures:
H. Belencan, EM-453
M. Karol, AMPME
D. Ruscitto, AMOWM
S. Keith, EG&G